

1 BITA RAHEBI (CA SBN 209351)
brahebi@mofo.com
2 MORRISON & FOERSTER LLP
707 Wilshire Boulevard
3 Los Angeles, CA 90017-3543
Telephone: (213) 892-5200
4 Fax: (213) 892-5454

5 ARTURO J. GONZALEZ (CA SBN 121490)
agonzalez@mofo.com
6 MORRISON & FOERSTER LLP
425 Market Street
7 San Francisco, CA 94105-2482
Telephone: (415) 268-7000
8 Fax: (415) 268-7522

9 ROMAN A. SWOOPES (CA SBN 274167)
rswoopes@mofo.com
10 H. CHRISTOPHER HAN (CA SBN 295435)
chan@mofo.com
11 AARON D. BRAY (CA SBN 327771)
abray@mofo.com
12 MORRISON & FOERSTER LLP
755 Page Mill Road
13 Palo Alto, CA 94304
Telephone: (650) 813-5600
14 Fax: (650) 494-0792

15 Attorneys for Defendant
APPLE INC.

17 UNITED STATES DISTRICT COURT
18 NORTHERN DISTRICT OF CALIFORNIA

20 ZENTIAN LTD.,
21 Plaintiff,
22 v.
23 APPLE INC.,
24 Defendant.

Case No. 23-cv-02921-TLT

Hon. Trina L. Thompson

**STIPULATION AND
[PROPOSED] ORDER TO STAY
CASE**

Plaintiff Zentian Ltd. and Defendant Apple Inc. hereby stipulate and request that the Court stay this action pending the completion of challenges at the Patent Trial and Appeal Board (“PTAB”) concerning U.S. Patent Nos. 7,587,319 (the “’319 Patent”), 7,979,277 (the “’277 Patent”), 10,062,377 (the “’377 Patent”), 10,839,789 (the “’789 Patent”), and 10,971,140 (the “’140 Patent”) (together, the “Asserted Patents”).

WHEREAS, Apple filed petitions for *inter partes* review (“IPR”) challenging the Asserted Patents as outlined in the below chart:

Case No.	Patent	Claims Challenged	Petitioner	Date Filed	Institution Decision
IPR2023-00033	’319	46-51, 53, 54, 58, 59, 64, 67	Apple Inc.	12/02/2022	Instituted June 12, 2023
IPR2023-00034	’277	1, 4, 5, 7, 9, 10, 12, 14-16	Apple Inc.	11/15/2022	Instituted June 12, 2023
IPR2023-00035	’377	All	Apple Inc.	11/15/2022	Instituted June 12, 2023
IPR2023-00036	’789	1, 2, 4, 6-14, 16-18, 20-29, 35, 37-39, 42-45	Apple Inc.	11/15/2022	Instituted June 12, 2023
IPR2023-00037	’140	All	Apple Inc.	12/02/2022	Instituted June 12, 2023

WHEREAS, the parties agree that a stay of this action pending resolution of the now-instituted IPRs of the Asserted Patents filed by Apple would conserve both judicial and party resources;

WHEREAS, the parties agree that as part of the stay, all discovery will be paused, including all discovery between the parties and all third-party discovery;

IT IS HEREBY AGREED AND STIPULATED by and between the parties, through their respective counsel, subject to Court approval, THAT:

1. The case shall be immediately stayed subject to the Court’s approval of this stipulation. All dates and deadlines are stayed as of the filing of this stipulation.
2. The Parties shall file a joint status report within fourteen (14) days of issuance of the final written decisions in the proceedings listed above, with the parties’ positions on whether

the stay should be lifted. The stay shall remain in effect absent further order from this Court.

/s/ Katherine E. Rhoades

/s/ Roman A. Swoopes

Kayvan B. Noroozi (SBN 271167)
NOROOZI PC
11601 Wilshire Blvd, Suite 2170
Los Angeles, CA 90025
(310) 975-7074
kayvan@noroozipc.com

BITA RAHEBI (CA SBN 209351)
brahebi@mofo.com
MORRISON & FOERSTER LLP
707 Wilshire Boulevard
Los Angeles, CA 90017-3543
Telephone: (213) 892-5200
Fax: (213) 892-5454

Nevin M. Gewertz (*pro hac vice*)
Rebecca T. Horwitz (*pro hac vice*)
Katherine E. Rhoades (*pro hac vice*)
Jessica R. Bernhardt (*pro hac vice*)
BARTLIT BECK LLP
54 West Hubbard Street
Chicago, IL 60654
(312) 494-4400
nevin.gewertz@bartlitbeck.com
rebecca.horwitz@bartlitbeck.com
katherine.rhoades@bartlitbeck.com
jessica.Bernhardt@bartlitbeck.com

ARTURO J. GONZALEZ (CA SBN 121490)
agonzalez@mofo.com
MORRISON & FOERSTER LLP
425 Market Street
San Francisco, CA 94105-2482
Telephone: (415) 268-7000
Fax: (415) 268-7522

ROMAN A. SWOOPES (CA SBN 274167)
rswoopes@mofo.com
H. CHRISTOPHER HAN (CA SBN 295435)
chan@mofo.com
AARON D. BRAY (CA SBN 327771)
abray@mofo.com
MORRISON & FOERSTER LLP
755 Page Mill Road
Palo Alto, CA 94304
Telephone: (650) 813-5600
Fax: (650) 494-0792

Attorneys for Plaintiff Zentian Ltd.

Attorneys for Defendant Apple Inc.

PURSUANT TO STIPULATION, IT IS SO ORDERED.

Dated:

Honorable Trina L. Thompson
United States District Judge

ECF ATTESTATION

I hereby attest that concurrence in the filing of this document has been obtained from each of the other signatories hereto.

Dated: 7/24/2023

/s/ Roman A. Swoopes

Roman A. Swoopes